

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA RECORDS CENTER
 FACILITY Pratt & Whitney Main St
 I.D. NO. CTD990672081
 FILE LOC. R-1B
 OTHER RDMS #2719

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James D. Wickwire
 Plant Engineer
 Pratt & Whitney Aircraft Group MD&CPD
 400 Main Street
 East Hartford, Connecticut 06108

Re: EPA I.D. No. CTD990672081

Dear Mr. Wickwire:

The Resource Conservation and Recovery Act (RCRA) requires each person owning or operating a hazardous waste treatment, storage or disposal facility to have a permit issued pursuant to Section 3005 of RCRA. Since November 19, 1980, your facility has been operating under interim status pending final administrative disposition of your permit application. In order to complete the consideration of RCRA permit applications, the Environmental Protection Agency (EPA) regulations at 40 CFR § 122.22(a)(4) provide the EPA with the authority to request the submission of a Part B permit application. Owners and operators are allowed at least six months from the date of receipt of a request to submit a Part B permit application.

Accordingly you are hereby required to submit within six (6) months of receipt of this request a complete permit application to EPA, Region I, RCRA Permits, P.O. Box 8748, Boston, Massachusetts 02114. The information required for submittal is set forth in 40 CFR § 122.25 and published in the following Federal Registers:

Volume 45, Monday, January 12, 1981, pages 33434 and 33435 - General Information Requirements

Volume 46, Monday, January 12, 1981, pages 2889 thru 2892 inclusive General information requirements including location, closure and post closure, and specific information requirements for containers, tanks, storage surface impoundments and waste piles

Volume 46, Friday, January 23, 1981, pages 7666 - 7683 specific information requirements for incinerators

Volume 47, Friday, November 6, 1981, Pages 55110 - 55113, container and pile standards applicable to hazardous waste manage-

SYMBOL	Permit						
SURNAME	Pratt & Whitney	Hebner			RCB/11	12/9-29-82	
DATE	9/30/81	9/30/81					

Volume 47, Wednesday, April 7, 1982, pages 15032 - 15064, financial requirements applicable to hazardous waste management facilities.

Volume 47, Friday, April 16, 1982, pages 16544 - 16558, liability requirements applicable to hazardous waste management facilities.

Volume 47, Thursday, June 24, 1982, pages 27516 - 27535, general and specific information requirements for incinerators.

Volume 47, Monday, July 26, 1982, pages 32274 - 32372, general and specific information requirements for land disposal facilities.

Volume 47, Thursday, June 24, 1982, pages 27,531 through 27,535, Part 264 Standards For Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, Subpart O - Incinerators, and Part 122 - EPA Administered Permit Programs: The Hazardous Waste Permit Program contains important information concerning incinerator performance standards and operating requirements as well as detailing information which must be submitted in an incinerator permit application.

In addition I have enclosed for your information and use a copy of our publication entitled "A Guide For Preparing RCRA Permit Applications For Existing Storage Facilities". Although the publication does not address the specifics of incinerator or land disposal permit applications it does address storage in tanks and containers which may be applicable to your facility.

It is important to note that applicants must submit a statement with the incineration portion of the application which identifies the conditions necessary to operate in compliance with the performance standards of § 264.343. For the purpose of determining feasibility of compliance with the performance standards of § 264.343 and of determining operating conditions under § 264.345 the applicant may prepare and submit a trial burn plan and perform a trial burn in accordance with an approved trial burn plan. Applicants may submit their trial burn plan either before or with their permit application. However, an applicant may choose to collect data during the course of normal operations or may acquire data from similar facilities burning similar wastes to be submitted with Part B of the permit application in lieu of conducting a trial burn in accordance with an approved trial burn plan.

Since the Regional Office is of the opinion that it would be quite difficult to substantiate attainment of the performance standards of § 264.343 based on data generated in the absence of an approved trial burn plan we suggest that you contact our office prior to initiating any performance or operating data collection activities.

If you wish to submit any of the information required under a claim of confidentiality please refer to 40 CFR Part 2 for the proper procedures.

Should you have any questions about the application requirements, please contact William Torrey of my staff at (617)223-4448.

Sincerely,

Dennis A. Huebner, Chief
State Waste Programs Branch

cc: CT DEP, Attn: Ed Parker

Enclosure

M.A. Andrew
Hazardous Waste Coordinator
Plant Engineering
Manufacturing Division



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